

Brad Demuth

From: Walter W. Noss <wnoss@scott-scott.com>
Sent: Wednesday, October 21, 2015 8:38 PM
To: Derek Brandt; Carmen Medici; Brad Demuth
Subject: Fw: AI - GS/Metro Discovery

----- Original message-----

From: Han, Suhana S.
Date: Thu, Oct 22, 2015 08:25
To: Walter W. Noss;
Cc:
Subject: RE: AI - GS/Metro Discovery

Walter,

I called you earlier today to let you know that we agree to plaintiffs' proposal regarding (i) Goldman Sachs custodians (Gabillon, Branton-Speak, Evans and Goertzen) and (ii) time period of August 1, 2009 to December 31, 2014. With respect to plaintiffs' proposed search terms, we're analyzing the terms and will get back to you shortly. With respect to Metro custodians, we agree to search the emails -- using agreed-upon search terms -- of Wibbelman, Askew, Whelan and Burgess-Allen for the time periods before (from August 2009) and after (up to December 2014) the relevant period for the CFTC production. As for the two additional Metro custodians, since plaintiffs haven't decided yet who they'll be, we propose tabling this until plaintiffs have had the chance to review the additional emails of these four custodians. If plaintiffs still want two more custodians, we'll consider further searches and let you know if we have any objections (e.g., burden, relevance).

Suhana

From: Walter W. Noss [mailto:wnoss@scott-scott.com]
Sent: Monday, October 19, 2015 6:29 PM
To: Han, Suhana S.
Subject: AI - GS/Metro Discovery

Suhana:

I polled the plaintiffs regarding the time period. Although we think our requested start time of 7/1/09 is reasonable and supported by the case law, if it will bring the issue to a resolution, then the plaintiffs will split the difference and move to 8/1/09.

Let me know if we have agreement w/ GS/Metro. Thanks.

-WW



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